

EXHIBIT E

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December 1, 2023

BY EMAIL AND FIRST-CLASS MAIL

M. Thériel Thélus
76 Lake Drive
Newburgh, NY 12550
therielthelus@gmail.com

Dear M. Thélus:

This law firm has been retained by M. Guerrier Henri, in connection with an article which originally appeared on your website, TripFoumi.com on January 31, 2023. It is still available on that website at the following link: [https://www.tripfoumi.com/blog/2023/01/31/ guerrier-henri-invite-au-parquet-de-port-au-prince-soupconne-de-meches-avec-des-gangs/](https://www.tripfoumi.com/blog/2023/01/31/guerrier-henri-invite-au-parquet-de-port-au-prince-soupconne-de-meches-avec-des-gangs/).

The headline of the article, originally written in French, says “Guerrier Henri invited to the Port-au-Prince prosecution for complicity and relations with armed gangs.” The article then goes on to describe the matter, and contains several false statements. In fact, on January 30, the day before your article appeared, M. Henri was merely invited to appear at the Public Prosecutor’s Office on February 1, just two days later. No charges or accusations were made in the letter. M. Henri was not in Haiti at that time, and he asked the Prosecutor to postpone the appearance. But he did not receive a response to his request, and has heard nothing further about the matter until the present time. Thus the headline is false, because the Prosecutor’s letter says nothing about “complicity and relations with armed gangs.”

Moreover, despite that he never appeared, and that no proceedings of any sort were commenced against him, the text of your article makes the following false and defamatory statements:

The information professional had been accused of having links with armed bandits. In one of his releases, he had asked for forgiveness by the fact that he was giving the floor, on his broadcast, to notorious criminals.

His file is said to be on the verge of being transferred to the investigation office. The charges are: concealment, complicity and privileged relations with armed gangs, according to the aforementioned station.

The above statements are utterly false and they are defamatory *per se*, in that they are factual assertions of criminal conduct. The Prosecutor’s letter makes no such allegations against him, and

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M. Thériel Thélus

no such statements were made by the Prosecutor afterward. There was no file “on the verge of being transferred,” and there are and were no charges of any sort against M. Henri.

The statements have caused grave damage to M. Henri’s reputation and professional status as a prominent radio broadcaster, including threats of violence against him. In my opinion, M. Henri has a substantial claim for defamation under New York law against you because of these statements.

The intent and purpose of this letter is to provide you with an opportunity to resolve this matter without litigation. On behalf of M. Henri, we demand that you take the following actions:

1. Remove the article completely and permanently from your own and the TripFoumi.com website, and take steps to insure that it has not been re-posted anywhere else, including your Facebook page, YouTube and Google, and if it has, to have it removed from anywhere else where it appears.

2. Post a public apology on the website, your Facebook page, YouTube and Google, expressing regret for the false statement and acknowledging that it was false. The statement would be in English, French and Creole.

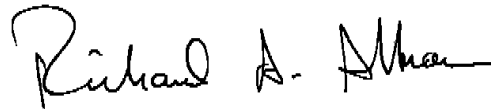
3. Agree to pay a certain nominal sum in damages, to be discussed.

These are the general terms of a settlement, but they are also essential minimum aspects of one. If we can reach a specific agreement regarding the language of the apology and the sum for damages, upon these general terms, M. Henri will release you from any claims arising from the article and that will be the end of the matter. If not, I will advise him to take legal action against you without further notice.

I request that you have your legal counsel reach out to me to initiate good-faith discussions regarding settlement, within the next ten days.

Thank you for your attention.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard A. Altman". The signature is fluid and cursive, with the first name "Richard" being more prominent.

Richard A. Altman